

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

In re:)
ELIZABETH ANN CARTMILL) Case No. 13-10278 JDL
Debtor) Chapter 13

**MOTION TO MODIFY CONFIRMED PLAN AND REQUEST FOR
COMPENSATION AND RESOLVE TRUSTEE'S MOTION TO CONVERT
AND NOTICE OF OPPORTUNITY FOR HEARING**

COMES NOW the Debtor, **Elizabeth Cartmill**, pursuant to the Bankruptcy Code, and moves the Court for an Order modifying her Chapter 13 Plan, and would show the Court the Following:

1. That the debtor filed a voluntary bankruptcy petition on January 25, 2013 and the case was confirmed on May 10, 2013.
2. That the Debtor works as a realtor for a broker and has had a downturn in sales. However, the Debtor was able to send in \$18,000.00 in March 2016 in plan payments. As a result, the Debtor is still behind on her plan payments. That the Debtor is treated as current through March 2016 with her plan payments. That beginning in April 2016 the plan payment needs to increase to \$6,400.00 for the remainder plan.
3. The Debtor's Attorney requests to be paid an additional \$500.00 for preparation and mailing of this Motion, to be paid through the plan.

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than 21 days from the date of filing of this request for relief. You should also serve a file stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

The 21 day period includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006(f).

WHEREFORE, Debtor requests this Court enter an Order allowing the debtor to modify her Chapter 13 plan payment, and for any such other and further relief as this court deems appropriate.

Dated: March 23, 2016.

/s/ Jeffrey E. West
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CERTIFICATE OF MAILING

I hereby certify that on 23rd day of March 2016, a true and correct copy of **Motion to Modify**, filed on 23rd day of March 2016 was electronically served using the CM/ECF system, namely: John Hardeman, Chapter 13 Trustee. Further, I certify that on the 23rd day of March 2016 copies of the **Motion to Modify** filed on 23rd day of March 2016 were forwarded via United States mail, first class, postage prepaid and properly addressed to the following at the addresses shown below.

See Attached Matrix /s/ Jeffrey E. West

JEFFREY E. WEST

AA COMPUTER SERVICES
901 SW LEE BLVD
LAWTON OK 73501

AM+PM CLINIC/ ARJUMAND
GHAYAS MD
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LAWTON OK 73502-0785

AM+PM CLINIC/JANICE LEPP
PO BOX 785
LAWTON OK 73502-0785

AMC
PO BOX 1235
ELMSFORD NY 10523-0935

BAY AREA C S
1000 ABERNATHY RD NE STE
ATLANTA GA 30328

BAY AREA CREDIT SERVICE
PO BOX 467600
ATLANTA GA 31146

BERLIN-WHEELER
PO BOX 479
TOPEKA KS 66601-0479

BK OF AMER
ATTN: CORRESPONDENCE
UNIT/CA6-919-02-41
PO BOX 5170
SIMI VALLEY CA 93062

BRLNWHLR
PO BOX 479
TOPEKA KS 66607

CANCER CENTERS OF SW OK
PO BOX 25016
OKLAHOMA CITY OK 73125-
0016

CENTRAL STATES RECOVERY
PO BOX 3130
HUTCHINSON KS 67504-3130

CITIFINANCIAL
BK REMITTANCE
PO BOX 140069
IRVING TX 75019

CITY OF DERBY
EL PASO WATER CO.
611 MULBERRY RD, STE 300
DERBY KS 67037-3591

CITY OF DERBY
611 N. MULBERRY
DERBY KS 67037-3533

CITY OF DERBY
EL PASO WATER CO.
PO BOX 327
DERBY KS 67037-0327

CITY OF DERBY
PO BOX 327
DERBY KS 67037-0327

CITY OF OKLAHOMA CITY
PO BOX 26570
OKLAHOMA CITY OK 73126-0570

CMRE FINANCIAL SERVICES
INC
3075 E IMPERIAL HWY
SUITE 200
BREA CA 92821

CMRE FINANCIAL SERVICES,
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COMANCHE COUNTY
HEALTHCARE
PO BOX 785
LAWTON OK 73502-0785

COMANCHE COUNTY
MEMORIAL HOSPITAL
PO BOX 129
LAWTON OK 73502-0129

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INTERNATIONAL
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ARLINGTON TX 76004

CREDIT SYSTEMS
INTERNATIONAL
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LOWES / MBGA / GEMB
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PO BOX 603
OAKS PA 19456

MCM DEPT 12421
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MIDLAND FUNDING
8875 AERO DR
SAN DIEGO CA 92123

MIDWEST SERV
625 W MAPLE
WICHITA KS 67213

MILLER ELECTRIC
629 N. GEORGIE
DERBY KS 67037

MUNICIPAL SERVICES BUR
PO BOX 16755
AUSTIN TX 78761

OKLAHOMA TAX COMMISSION
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PO BOX 269060
OKLAHOMA CITY OK 73126-
9060

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